

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TEYO JOHNSON,	:
	:
Plaintiff,	:
	:
-against-	:
	:
	:
EVERYREALM INC., COMPOUND ASSET	:
MANAGEMENT LLC, REALM METAVERSE	:
REAL ESTATE INC., REPUBLIC, REPUBLIC	:
CRYPTO LLC, REPUBLIC REALM MANAGER	:
LLC, REPUBLIC REALM INC., REPUBLIC	:
OPERATIONS LLC, OPENDEAL INC.,	:
OPENDEAL PORTAL LLC, JULIA SCHWARTZ	:
in her individual and professional capacities,	:
WILLIAM KERR in his individual and	:
professional capacities, and JANINE YORIO in her	:
individual and professional capacities.	:
	:
Defendants.	:
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Case No. 1:22-cv-06669(PAE)(GWG)

DECLARATION OF
JANINE YORIO

Janine Yorio, having personal knowledge of the facts herein, and under penalty of perjury, hereby states:

1. I currently serve as the Chief Executive Officer of Everyrealm Inc., and am a resident of the State of New York. I submit this Declaration based upon my personal knowledge and in support of the Motion to Dismiss Plaintiff’s Claim for Sexual Harassment on behalf of Everyrealm Inc. (“Everyrealm”), Julia Schwartz (“Ms. Schwartz”), William Kerr (“Mr. Kerr”) and myself (collectively “the Everyrealm Defendants”) in the above-captioned matter.

2. On March 21, 2022, Plaintiff Teyo Johnson (“Johnson”), myself, Zach Hungate, Julia Schwartz and other Everyrealm employees met with representatives of Cookies, including Cookies’ CEO Parker Berling (“Berling”), to discuss potential business opportunities.

3. Following the March 21, 2022 meeting with representatives of Cookies, Johnson sent a message to myself and others via Everyrealm’s Slack Instant Messenger application stating that he believed Berling was in love with me, and had a bad personality “like [his] kid[‘s] Mom.”

4. A true and correct copy of the messages described in paragraph 6 is attached hereto as Exhibit A.

5. During the week of March 11, 2022, Everyrealm sponsored a company event at the South by Southwest music festival in Austin, Texas.

6. Plaintiff Teyo Johnson attended the music festival on behalf of Everyrealm.

7. On March 16, 2022, following the company event, Plaintiff sent me an email stating: “Just got to the crib in Vegas. Thank you so much for everything Janine, I really enjoyed being around you and learning from you and working with you. Not to mention the immense amount of fun and laughter. I truly feel like I’m part of a tribe that is on a special journey during a special time. I AM ALL IN. Thanks again!”

8. A true and correct copy of Plaintiff’s March 16 email is attached hereto as Exhibit B.

9. On June 2, 2022, in response to Plaintiff Teyo Johnson publicizing to Everyrealm employees that a woman he was seeing would not engage with him in sexual relations, Katherine Yost sent me a text message stating: “Look at you blaming yourself for Teyo[‘s] misogyny like

you encouraged [it]. All you did was engage about a friend he introduced. We've been gaslit to believe we bring this all on. And it's horseshit."

10. A true and correct copy of Katherine Yost's text message is attached hereto as Exhibit C.

11. Also on June 2, Katherine Yost and I discussed Teyo Johnson's inappropriate remarks via Everyrealm's Slack Instant Messenger application.

12. In the messages, Yost wrote, "[Johnson] is a misogynist that's evident."

13. I responded by stating, "when [Johnson] told everybody in the office (with disgust) that the girl who he was crashing with had her period (insinuating that he couldn't sleep with her as a result) that really put me off . . .that's across the line"

14. Yost replied, "I would have walked him out into the hall and slammed him . . . I don't care how big anyone is."

15. I then wrote, "maybe I started it . . . I was calling [Johnson's date] 'dog in a bag.'"

16. Yost then responded, "[j]oking about a dog in a purse is not asking for sexual updates . . . It's gross and most people (humans) know not to do this"

17. A true and correct copy of the above-described conversation is attached hereto as Exhibit D.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: 11 / 02 / 2022



Janine Yorio